AFFIDAVIT OF GERALD ARMSTRONG

I, Gerald Armstrong state and declare under the pains and penalties of perjury as follows:

1. I was in Scientology from 1969 to 1981. I worked personally for L. Ron Hubbard during much of that time, and was personally appointed by Hubbard to be the researcher on a proposed biography of his life. During my work on that biography I assembled many documents concerning almost all of Hubbard's life, and discovered that he had extensively lied about his education, credentials, past accomplishments, his role in Scientology, and Scientology itself. When I tried to work within the organization to make the truth known in a manner which would least damage Scientology and Hubbard, organization officials claimed I was an enemy trying to destroy the founder.

2. After I left the organization I was declared a "suppressive person" and subjected to the "Fair Game" doctrine. The organization began a "Black Propaganda Campaign" aimed at destroying my reputation. They initiated a covert intelligence operation against me, stole photos I had, and when I demanded their return told me to get an attorney. Fearing I would become the target of costly and harassive lawsuits, and believing my life and my wife's life were in danger, and needing to defend

myself, I contacted attorney Michael Flynn. I obtained from the author for whom I had done the biography research, copies of some of the documents I had seen while working on the biography project and I sent these documents to Mr. Flynn. The documents proved that what I had been saying about Hubbard was true and they showed a massive fraud on his part.

3. Scientology sued me, and after a five week trial in the California Superior Court it was ultimately determined that I was justified in sending the subject documents to my attorney. The Court stated in its decision, a copy of which is attached as Exhibit D to this opposition:

> "...just as the plaintiffs have First Amendment rights, the defendant has a constitutional right to an attorney of his own choosing. In legal contemplation the fact that defendant selected Mr. Flynn rather than some other lawyer cannot by itself be tortious. In determining whether the defendant unreasonably invaded Mrs. Hubbard's privacy, the court is satisfied the invasion was slight, and the reasons and justification for defendant's conduct manifest. Defendant was told by Scientology to get an attorney. He was declared an enemy by the Church. He believed, reasonably, that he was subject to "fair game." The only way he could defend himself, his integrity, and his wife was to take that which was available to him and place it in a safe harbor, to wit, his lawyer's custody."

4. The knowledge that I have and the documents that I have seen are particularly damning to Hubbard and Scientology. Based on them, in part, Judge Breckenridge in his opinion in Church of Scientology of California v. Armstrong, C420 153, found that "the Church or its minions is fully capable of intimidation or other physical or psychological abuse", it "abuses its own members civil rights", "the organization over the years with its 'Fair Game' doctrine has harassed and abused those persons not in the Church whom it perceives as enemies", L. Ron Hubbard is "a man who has been virtually a pathological liar when it comes to his history, background, and achievements", and Scientology's "practice of culling supposedly confidential 'PC folders or files' to obtain information for purposes of intimidation and/or harassment is repugnant and outrageous." All of these findings were made by Judge Breckenridge in the case Scientology brought against me.

5. In order to compromise my effectiveness as a witness and undo the Breckenridge judgment, Scientology created the "Armstrong Operation". It was a Scientology setup from the start. I was contacted in June of 1984 by an old friend of mine who told me that a group of individuals called the "Loyalists" were seeking to reform the organization, and end the criminal and tortious activities and the Fair Game doctrine. My friend said the "Loyalists" had existed for two years, they had people on staff in the organization and many others who supported their cause. The "Loyalists" wanted my help because

I had contacts among other individuals who opposed the organization's practices, and because I had been successful in litigating against the organization. They wanted me to act as their consultant.

6. I had several meetings with representatives of the "Loyalists" and was even taken to meet an attorney whom they said was going to file a lawsuit on their behalf to oust what they called the "criminal management" of Scientology. Unknown to me, these meetings were covertly and illegally videotaped. The entire operation was a setup. The "Loyalists" had no intention of ending the organization's illegal activities and were not planning to file a lawsuit. They were a fictional creation to make it look like I was conspiring to overthrow Scientology.

7. The videotapes do not reveal all of my conversations with the "Loyalists". Scientology has chosen those parts which it feels are most beneficial to them. Even the videotapes they do use do not show what Scientology claims. They simply reveal conversations about ideas proposed by the "Loyalists" for their use in their struggle. Of course, since the "Loyalists" never really existed, nothing was ever carried out. In any event, the wild claims Scientology makes, that I conspired to plant false documents, steal privileged information, and set up some sort of sexual blackmail situation, are ridiculous. Judge Londer, in the case of Christofferson v. Scientology, et al, in Portland, Oregon recognized that the

tapes do not say what the organization says they say. He stated, immediately after viewing the tapes on April 4, 1985:

> "I think they are devastating. I think they are devastating against the Church. We certainly view them in a different way, Mr. Cooley, you and I."
>
> ..."it borders more on entrapment than it does on anything else. How a sophisticated person, which Mr. Armstrong purports to be, could go for such an amateurish performance as I heard on these tapes is beyond me. The questions were being fed to him obviously; anytime he wanted to make an explanation, it was promptly cut off. There was no evidence of any attempt to commit a crime that I saw."

In fact, on the tapes themselves, in response to a suggestion by one of the "Loyalists", an operative named Mike Rinder, that false documents be created, I reply, "I wouldn't touch it with a barge pole."

8. Despite Scientology allegations to the contrary, I was not acting as an agent of Michael Flynn, or various government agencies when I met with the "Loyalists". I simply was responding to the "Loyalists'" request for help from me, and I accepted their offer to help me out. They actively encouraged me to request all sorts of things, claiming they could get whatever I needed. Any requests I sent them I originated on my own. Neither Michael Flynn nor the federal government asked me to obtain any documents or information for them from the "Loyalists". In fact, Michael Flynn cautioned me that the "Loyalists" might be an operation created by Hubbard.

9. Under California law, an individual cannot be videotaped wtihout his consent. Scientology, at the Christofferson trial, claimed that a private investigator hired by them, Eugene Ingram, (who had been kicked off the Los Angeles police force for various offenses) obtained an authorization to secretly tape me from a police oficer. In an official statement released by the Los Angeles Police Department, however, LAPD Chief Daryl Gates stated that the officer had no authorization, and that it would be "a cold day in hell" before the Los Angeles Police Department co-operated with Eugene Ingram. A copy of this announcement is attached hereto as Exhibit A. I have learned from Commander Booth of the LAPD that the officer involved, Phillip Rodriguez, was suspended for six months due to his improper "authorization".

10. If this court has any doubts about this entire illegal affair, I urge it to view the tapes themselves. They will plainly show that the Scientology charges are ridiculous and grossly inflated. It will also prove to the court that Scientology engages in precisely the types of covert criminal and tortious operations in violation of individuals' rights which its critics have alleged it has committed for years.

Signed under the pains and penalties of perjury this 1st day of November, 1985, in Boston, Massachusetts.

Gerald

GERALD ARMSTRONG

Suffolk, SS. Commonwealth of Massachusetts 11/1/85

Then appeared before me the above named Gerald Armstrong and acknowledged the aforegoing to be his true act and deed.

Before me,

Susan E. Dolesto

My Commission Expires 3/15/89

April 23, 1985

PUBLIC ANNOUNCEMENT
BY
DARYL F. GATES
CHIEF OF POLICE, LOS ANGELES

It has come to my attention that a member of the L. A. P. D. very foolishly, without proper authorization and contrary to the policy of this Department, signed a letter to Eugene M. Ingram, believed to have been drafted by Ingram himself. The letter purports to authorize Ingram to engage in electronic eavesdropping. The letter, along with all the purported authorization, is invalid and is NOT a correspondence from the Los Angeles Police Department.

The Los Angeles Police Department has not cooperated with Eugene Ingram. It will be a cold day in hell when we do.

I have directed an official letter to Ingram informing him that the letter signed by Officer Phillip Rodriguez dated November 7, 1984, and all other letters of purported authorizations directed to him, signed by any member of the Los Angeles Police Department, are invalid and unauthorized.

Internal Affairs Division is now investigating the entire incident.

THIS IS TO CERTIFY THAT I HAVE EXAMINED THE ORIGINAL OF THIS DOCUMENT AND FIND THIS REPRODUCTION TO BE A TRUE COPY OF SAME, MADE WITHOUT ALTERATIONS OR ERASURES.

By Sgt E Hernandez 14828
RECORDS & IDENTIFICATION DIVISION
LOS ANGELES POLICE DEPARTMENT

Dated: 5-16-85

A.